

1 Q And you read it. And you -- were you -- did you  
2 consider yourself what's called a programmer? That's the  
3 term, isn't it, when you were producing "Felicidad?" Strike  
4 that. Is that a term you're familiar with, programmer?

5 A Someone who hosts his own program, yes, sir.

6 Q And would you explain to me what the financial  
7 arrangements were concerning the production of that program?  
8 How did it work?

9 A I paid for it.

10 Q You paid for it.

11 A Yes, sir.

12 Q And you paid for the production costs?

13 A Yes, sir.

14 Q And for -- and what did you receive in return for  
15 paying the production costs?

16 A The satisfaction of helping many people, sir.

17 Q You certainly did that I'm sure. I meant -- and I  
18 wasn't -- my question wasn't clear. In return for paying the  
19 production costs, the program was broadcast over TBN.

20 A Yes, sir.

21 Q And were there -- were you permitted to make  
22 solicitation for funds on that, on that program?

23 A Yes, I was.

24 Q And, and I imagine you did.

25 A Yes.

1 Q And was that the, and was that the way it continued,  
2 the financial relationship to continue in exactly the same way  
3 from 1976 until 1986?

4 A No, sir.

5 Q It changed?

6 A Yes.

7 Q Would you tell me about the change?

8 A I couldn't tell you exactly what year it was. But  
9 there came the time when the financial pressure became too  
10 great, and I felt that I could not continue paying for the  
11 program.

12 Q And then what happened?

13 A I approached -- I'm not sure who it was.  
14 Eventually, I was taken to Mr. Crouch's office, and I told him  
15 that -- well, I thanked him for allowing me the time to, to  
16 have my program on the network but that I could no longer  
17 continue.

18 Q Because you couldn't afford it.

19 A That's right.

20 Q And what happened?

21 A He, he asked me to continue and that Trinity  
22 Broadcasting would, would pick up the expenses.

23 Q And did he permit you to continue to, to solicit  
24 funds on the program?

25 A Not for myself.

1 Q The funds then went to Trinity.

2 A Yes, sir.

3 Q That was, that was the, the change in the  
4 arrangement.

5 A Yes. Um-hum.

6 Q So you no longer paid, but there was solicitation,  
7 but then Trinity received the, the solicitations.

8 A That's correct, sir.

9 Q And is that the way you continued until 1986?

10 A Yes, sir.

11 Q Were there any other changes?

12 A I don't believe so, sir.

13 JUDGE CHACHKIN: Did you receive anything for  
14 producing the program? After you made the arrangement whereby  
15 you were no longer able to solicit funds, did you receive  
16 anything from TBN for producing the program?

17 MR. ESPINOZA: Yes, I did, sir.

18 JUDGE CHACHKIN: What was that arrangement?

19 MR. ESPINOZA: Well, I would receive letters.

20 JUDGE CHACHKIN: What letters? What are you talking  
21 about?

22 MR. ESPINOZA: Well, when you solicit, people send  
23 in a note or a letter with, with some money. And they would  
24 go to P.O. Box A, Santa Ana. They would take out the money,  
25 then they would forward the letters to me. I was making an

1 offer on my program, and I would generally pay my own expenses  
2 in, in providing books or things that could help the people.  
3 So they would send me the letters. And I in turn would send  
4 them the books, the material, the follow-up letter to continue  
5 helping the people.

6 BY MR. COHEN:

7 Q But that was coming out of your pocket.

8 A Yes, sir.

9 Q Because you told me a minute ago that Trinity would  
10 keep the, the money that would, that came in.

11 A Yes, sir.

12 Q So -- I understand.

13 JUDGE CHACHKIN: So when you sent these books, what  
14 books are we talking about that you sent?

15 MR. ESPINOZA: Books that I would purchase, for  
16 example, books written by Dr. Billy Graham, people of that  
17 nature, books pertaining to family and enrichment of one's  
18 life.

19 JUDGE CHACHKIN: When you said you kept the letters,  
20 did you then solicit funds with these letters from these  
21 individuals you sent the books to?

22 MR. ESPINOZA: Never, sir.

23 JUDGE CHACHKIN: Well, so you're saying you received  
24 nothing from -- once you changed your arrangement with TBN  
25 whereby they paid for production expenses --

1 MR. ESPINOZA: Um-hum. Yes, sir.  
2 JUDGE CHACHKIN: -- you received nothing.  
3 MR. ESPINOZA: In the area of finances?  
4 JUDGE CHACHKIN: Yes.  
5 MR. ESPINOZA: That's correct, sir.  
6 JUDGE CHACHKIN: You didn't receive a percentage of  
7 the money that came into TBN.  
8 MR. ESPINOZA: Oh, no. Not at all, sir.  
9 JUDGE CHACHKIN: But then you say there were -- you  
10 mean when, when solicitations were made there, people  
11 requested certain books to be sent to them? I don't quite  
12 understand where the books came in.  
13 MR. ESPINOZA: I would -- on the program itself, I  
14 would make an offer. If you write today, I will send you a  
15 particular book or something along that line. And so I would  
16 send them the book. On my own expenses I will send them the  
17 book.  
18 JUDGE CHACHKIN: But these individuals who wrote in,  
19 did they make a -- did they send funds in also?  
20 MR. ESPINOZA: Yes, sir.  
21 JUDGE CHACHKIN: But you didn't keep any of it.  
22 MR. ESPINOZA: Not at all.  
23 JUDGE CHACHKIN: But you on your own sent them  
24 books, various books of different kinds.  
25 MR. ESPINOZA: Yes, sir.

1 JUDGE CHACHKIN: Go ahead, Mr. Cohen.

2 BY MR. COHEN:

3 Q Am I correct, pastor, that the result that, pursuing  
4 what the judge just suggested, when the arrangement changed,  
5 the result was that you were reaching into your, your pocket,  
6 so to speak, to send these books to the persons, to the  
7 persons who wrote you?

8 A Yes, sir.

9 Q You must have been very committed to Trinity to be  
10 willing to absorb that personal expense.

11 A It wasn't a matter of being committed to Trinity.  
12 It was a matter of being committed to people. As a pastor,  
13 part of my responsibility is, is a follow-up making sure that  
14 people are all right. There were times when I would receive a  
15 letter from someone that was suicide prone, for example. So I  
16 would follow up through correspondence. Sometimes, sometimes  
17 I'd call them. Sometimes I'd actually meet them, or sometimes  
18 I would refer them to a pastor wherever they lived.

19 Q Did you ever suggest to Dr. Crouch that, that  
20 Trinity should pay for the cost of these books?

21 A Not at all. Never.

22 Q Now when did the arrangement change? Can you give  
23 me your best recollection? The period of time is from '76 to  
24 '86.

25 A I don't remember, sir. I really don't.

1 Q Well, was it halfway between? Somewhere in --  
2 what's your best recollection?

3 A Perhaps 2, 3, 4 years.

4 Q I want to show you a document which is in the  
5 Glendale exhibits. Let me help you find that.

6 A Thank you.

7 Q Glendale 188.

8 (Pause.)

9 Q Now this is a letter of agreement which is not, not  
10 with you. It was with, it's with E. V. Hill. But I, I want  
11 you to look at that if you would. And tell -- and the  
12 question I have is did you ever enter, enter into a written  
13 agreement with, with Trinity? And I'm showing you that one  
14 just to try to help your recollection.

15 A Um-hum.

16 Q That's not an agreement with you.

17 (Pause.)

18 Q Did you ever enter into a programmers agreement  
19 with, with Trinity?

20 A Mr. Cohen, I don't believe so.

21 Q Nothing in writing?

22 A No, sir.

23 Q You never signed a document -- I don't mean the  
24 identical document. But a document that set forth the, the  
25 terms of the arrangement between you and Trinity?

1           A     I may have. But I really don't remember, sir.

2           Q     Well, in connection with the discovery, we went  
3 through this in the deposition, you looked in your files. And  
4 you, you had no such -- in connection with the -- remember  
5 the, we asked you -- I asked you about, the request for  
6 production of documents.

7           A     Um-hum.

8           Q     You've told us that you had looked in your files.

9           A     Yes, sir.

10          Q     So I take it you had no, no such document in your  
11 files.

12          A     Mr. Cohen, everything that I had I, I really did  
13 send it.

14          Q     And you, you don't have a recollection then as to  
15 whether or not you did enter into a written agreement with  
16 Trinity. Is that, is that what you're telling me?

17          A     I really don't believe so, Mr. Cohen.

18                   (Pause.)

19          Q     Now in addition to the "Felicidad" program, you also  
20 appeared on the Spanish language version of Praise the Lord.  
21 Is that right?

22          A     Yes, sir.

23          Q     And for how many years did that take place?

24          A     Not, not that often, Mr. Cohen.

25          Q     Well, give me your best recollection.



1           A     Perhaps four, half a dozen times.

2                   JUDGE CHACHKIN:  You want to know the years or how  
3 many times?

4                   MR. COHEN:  Well, I was going to ask him both  
5 questions.

6                   BY MR. COHEN:

7           Q     How many times, and as the judge suggests that was  
8 my next question.  Do you remember the years when that  
9 occurred?

10          A     It, it would have been towards, towards the  
11 beginning.  Because later on when I started my own program,  
12 with my church responsibilities and the TV program it was very  
13 difficult to get away.

14          Q     Well, to, to refresh your recollection, in your  
15 deposition I asked you -- this was in your California  
16 deposition, page 24, "Can you give me an approximate time  
17 frame for your appearances?"  And the answer was, "How many  
18 times I appeared?"  And I asked you how many and when, and you  
19 said, "Perhaps three or four times, late '70s, early '80s,  
20 something like that."

21          A     Um-hum.

22          Q     Does that refresh your recollection?

23          A     Yes, sir.

24          Q     And didn't you also appear on the program called  
25 Behind the Scenes?

1           A     That's correct, sir.

2           Q     And tell me about that?

3           A     Behind the Scenes is a segment where Mr. Crouch or  
4 someone else will, will appear and give an update as to how  
5 the station or the network is doing. And there were a couple  
6 of times when, when I had just finished taping a program, so  
7 my set was hot or the lights were, were all prepared. So they  
8 would use the set that I was using to have the Behind the  
9 Scenes segment. And a couple of times Mr. Crouch would ask me  
10 to, to sit in.

11          Q     Would you look at paragraph 5 of your testimony,  
12 please?

13                   (Pause.)

14          Q     And I, I call your attention to the -- well, first  
15 read the paragraph to yourself.

16                   (Pause.)

17          Q     Tell me when you've read it.

18          A     Yes, sir.

19          Q     You say there we would have disagreements, that is  
20 between you and Dr. Crouch, always resolved good naturedly.  
21 Will you, will you tell me what those disagreements were  
22 about?

23          A     Well, of course at the beginning since I was paying  
24 for my own program, there were times when I was not finished  
25 by 5 o'clock, but it was easier for him to want to use my set.

1 And I would say no, I'm not finished yet. I was paying for  
2 the time, and so I felt that I needed to finish my program.  
3 But it was always good naturedly resolved.

4 Q And was resolved by permitting you to continue?

5 A Well, I would continue, yes, sir. If I was  
6 finished, I would say Mr. Crouch, I'm finished. You can use  
7 the set, and that's about the extent of it.

8 Q Do you have any other examples of good-natured  
9 disagreements?

10 A No, I think that's about it.

11 Q I want to bring you back to 1980 to the formation of  
12 the Translator TV, Inc.

13 A Yes, sir.

14 Q Which later became NMTV. And just to focus you,  
15 Translator Television, Inc. was organized in September of  
16 1980. That's not a question. That's just to get you  
17 oriented.

18 A Yes, sir.

19 Q And do you recall who it was that asked you to  
20 become a director of, of Translator TV, Inc.?

21 A Mr. Crouch.

22 Q And do you, do you have a recollection of, of  
23 approximately -- accept as a fact that TTI was organized in  
24 September of 1980. What's your best recollection of when Dr.  
25 Crouch approached you?

1           A     Mr. Cohen, I'd really be guessing. But I'm, I'm  
2 saying that it's around that, that same area. But --

3           Q     Well, I don't want you to guess. And I think the  
4 judge will agree. Don't guess. If you can --

5           A     Okay. Sure.

6           Q     -- give me your best estimate, give it to me. But  
7 don't guess if you don't, if you don't really have a  
8 recollection. And the record will be, you know, say what it  
9 says.

10                     But let me ask you this. Was this in a telephone  
11 conversation? Or was this, was this in a face-to-face  
12 meeting?

13          A     Telephone.

14          Q     He called you.

15          A     Yes, sir.

16          Q     Do you have a recollection of, of that discussion?

17          A     Basically that -- just that he was inviting me to  
18 serve as a director on, on the corporation that was being  
19 formed. Something along that line, Mr. Cohen.

20          Q     And this was, this was of course prior to the time  
21 the organization was formed by definition, right? This is  
22 prior to the time TTI was organized and formed.

23          A     That I couldn't tell you exactly.

24          Q     Did he tell you what the purpose of the organization  
25 was going to be?

1 (Pause.)

2 A Mr. Cohen, to the best of my memory, he made mention  
3 of the fact that because I was a Hispanic that they wanted to  
4 involve Hispanics in the formation of this corporation.

5 Q You have a recollection of that.

6 A Yes, sir.

7 Q Well, at the time of your deposition -- well, let me  
8 ask you this. Was this conversation that you just talked  
9 about, was that with Mr., Mr. Crouch?

10 A The initial conversation?

11 Q Yes.

12 A Yes, sir.

13 Q And the initial conversation was the one when he, he  
14 told you what you just testified to.

15 A Yes, sir.

16 Q Well, I want to just read into the record what your  
17 deposition testimony was. This is on page 17. And I asked  
18 you, line 14 -- well, starting on line 10, how did, "How did  
19 it come about that you became a director of Translator TV,  
20 Inc.?" And you answered, "I was asked if I would consider  
21 getting involved in Translator." And the question was, "Do  
22 you recall who it was that asked you?" And the answer was,  
23 "Mr. Crouch."

24 And then I asked you, "Did he explain to you what  
25 your job would be or what your duties would be?" And your

1 answer was, "My initial contact with Mr. Crouch, he didn't go  
2 into full detail. But I saw it as an opportunity to do more  
3 for the Lord. So I said yes."

4 And my question was, "Was any explanation given to  
5 you prior to the time you became a member of Translator TV,  
6 Inc. as to what the purpose of that organization was going to  
7 be?" And you answered, "Prior?" And I, my question was,  
8 "Yes, sir." And you answered, "I believe it was Mrs. Duff  
9 that shared some of the thoughts of what she was trying -- of  
10 what was trying to be accomplished through TV, Inc."

11 And then I asked you, "Do you recall what those  
12 purposes were?" And your answer was, "It had to do with the  
13 filing of applications" --

14 A Yes, sir.

15 Q -- "to get stations" --

16 A Um-hum.

17 Q -- "low-power stations." Now was any explanation  
18 given to you as to where the money would come from in order to  
19 pay for the filing of the application for the building of the  
20 station?

21 A Eventually yes, sir.

22 Q And when you say eventually, give me your best  
23 recollection as to what eventually means in terms of time.

24 A I really couldn't, because I'd be guessing, sir.

25 Q At some -- there did, there did come a time that

1 you were told.

2 A Yes, sir.

3 Q And was any explanation given to you -- I'm now  
4 talking about at the beginning, the conversations you had with  
5 Mrs. Duff and Dr. Crouch. Was any explanation given to you as  
6 to what the programming of these stations would be?

7 A I believe it was the, the main source, of course,  
8 would be programs that were being produced by Trinity  
9 Broadcasting.

10 Q Well, at the deposition at page 18 in California, I  
11 asked you was any explanation -- this is line 17, "Was any  
12 explanation given to you as to what the programming of these  
13 stations would be?" And your answer was, "I assumed it would  
14 be religious in nature." And I asked you, "Did you have any  
15 understanding as to what the source of the programming would  
16 be?" And you answered, "No, not in the beginning."

17 A Um-hum.

18 Q Now I'm correct, aren't I, that from the outset of  
19 your relationship with TTI you believed its purpose was to  
20 spread the gospel through religious programming.

21 A Yes, sir.

22 Q And that information was conveyed to you by Mrs.  
23 Duff, wasn't it? Or by Mr. Crouch?

24 A I believe it would have been Mrs. Duff. But the  
25 whole idea was that I was getting involved because this was

1 my, my whole purpose of helping any way that I could to spread  
2 the gospel of Christ.

3 Q Of course. That's your, that's your mission in  
4 life.

5 A Yes, sir.

6 Q And that mission, that purpose of TTI never changed  
7 up until the time you resigned. Isn't that correct?

8 A Correct, sir.

9 Q It was always the same which was to spread the  
10 gospel.

11 A First and foremost, yes, sir.

12 Q And that's of course why you remained a director.

13 A Yes, sir.

14 Q And that was the reason that you were willing to  
15 donate your time to Translator Television, Inc., wasn't it --

16 A Yes, sir.

17 Q -- in order to spread the gospel?

18 A Yes, sir.

19 Q Because you believe very deeply.

20 JUDGE CHACHKIN: Is that -- you have to answer yes  
21 or no.

22 MR. ESPINOZA: Yes, sir. Thank you, sir.

23 MR. COHEN: Now wasn't it always clear to you that  
24 the programming was to come from TBN?

25 MR. ESPINOZA: I believe so, sir.



1 MR. COHEN: Now you became a director in September  
2 of 1980. And you resigned in August of 1990. You can accept  
3 that, those as facts, those -- you can accept those as facts.

4 MR. TOPEL: Could you give the base again?

5 MR. COHEN: Sure. The corporation was organized in  
6 September of 1980. And Pastor Espinoza resigned in August of  
7 1990.

8 MR. TOPEL: It's the second one that I'm not sure --

9 MR. COHEN: I mean that right? I made an error.  
10 I'd like, I'd like -- let's -- could we go off the record,  
11 Your Honor?

12 JUDGE CHACHKIN: Yes.

13 MR. COHEN: Because I, I certainly don't want to --  
14 (Off the record.)

15 JUDGE CHACHKIN: All right. Let's go back on the  
16 record.

17 BY MR. COHEN:

18 Q In an off-the-record discussion, you straightened me  
19 out. I mean you explained the accurate facts.

20 A I always love to help a friend, sir.

21 Q Well, I'm grateful to you. Because I need all the  
22 help I can get. Now you, you told us off the record that you  
23 resigned as a director on July 28th, 1990. Is that what you  
24 did tell us?

25 A Yes, sir.

1           Q     Now from the time you became a director until the  
2 time you resigned, insofar as you have knowledge, TTI never  
3 gave any consideration, did it, to carrying any programming on  
4 its low-power television station other than TBN programming?

5           A     To the best of my knowledge, I believe that's  
6 correct, sir.

7           Q     Now I'm going to ask you some, some questions later  
8 about the Odessa station.

9           A     Yes, sir.

10          Q     But now I just want to -- when I say the Odessa  
11 station, we're talking -- you know what I'm talking about.

12          A     Yes, sir.

13          Q     I'm talking about the, the station that,  
14 construction permit that NMTV bought and built the station and  
15 operated it. That's when I'm talking about Odessa. Now when  
16 Odessa was, was on the air, it broadcast only TBN programming.

17          A     I believe so, sir.

18          Q     Now you have longstanding ties or you had  
19 longstanding ties with Trinity. Is that right?

20          A     Yes, sir.

21          Q     And while you were serving as a director of TTI and  
22 then NMTV, you continued to have those strong ties with TBN,  
23 didn't you?

24          A     I believe I did, sir.

25                   (Pause.)

1 Q And the -- look at paragraph 24 of your testimony if  
2 you would. That's on page 15. And I'm referring to the  
3 second sentence which states the letter, that's your letter of  
4 resignation, represented more than that, however. In this  
5 letter, I was severing my last remaining tie with the Trinity  
6 Broadcasting Network. And then you go on to describe what  
7 your relationship had been with TBN.

8 A Yes, sir.

9 Q So you, you felt very close to TBN.

10 A Yes, sir.

11 (Pause.)

12 Q Now when you were elected a director, you were also  
13 elected to an office in the corporation as I understand it.  
14 Is that right?

15 A Yes, sir.

16 Q And do you have an understanding of what office you  
17 were elected to?

18 A Chief financial officer.

19 Q Now insofar as that office was concerned, the chief  
20 financial office -- officer which you were elected to, it's  
21 true, isn't it, that you relied upon Mrs. Duff to carry out  
22 the responsibilities of that office.

23 A Yes, sir.

24 Q And you knew Mrs. Duff in 1980, didn't you?

25 A Yes. Yes, sir, I believe so.

1 Q And would you, would you tell me how you came to  
2 know Mrs. Duff?

3 A When I had my own program, because I had been there  
4 for so many years I had to have it during the lunch break of,  
5 of going through the hall to the kitchen area, and you had to  
6 pass through a number of offices. And I'd generally poke my  
7 head in and say hello to the people.

8 Q And that's how you came to know her.

9 A I believe that's -- I believe so, sir.

10 Q But certainly when Mrs. Duff spoke with you before  
11 TTI was organized, you knew who she was.

12 A I'm under the impression that I was, sir, from again  
13 just from going in through the hall and saying hi to the  
14 people.

15 Q Did you know then when you accepted the office of  
16 chief financial officer, did you know that Mrs. Duff was an  
17 executive at TBN?

18 A I believe I did, sir.

19 Q And wasn't it your understanding that as part of her  
20 carrying out her, her TBN executive duties she would also  
21 carry out any responsibilities of, of the details of being the  
22 chief financial officer?

23 A Yes, sir.

24 Q Did you, did you have knowledge, pastor, as to  
25 whether Mrs. Duff received a salary from TTI?

1           A     That I really don't -- I, I don't recall, sir.

2           Q     You didn't receive any salary.

3           A     No.

4           Q     You contributed your time.

5           A     Yes, sir.

6           Q     And the other director, of course, was Dr. Crouch,

7 Paul Crouch.

8           A     Yes, sir.

9           Q     Did you have any knowledge -- as we speak today, do

10 you have any knowledge as to whether Dr. Crouch received any,

11 any income from TTI?

12          A     Not that I can recall, sir.

13          Q     Neither one of them ever told you they were, they

14 were receiving any income or compensation from TTI.

15          A     No.

16          Q     Now bringing you back to the, to the organization

17 of, of TTI, you came to realize that it was going to be in the

18 business of operating low-power television, low-power

19 television translator stations. Isn't that right?

20          A     That was my understanding, sir.

21          Q     And that was the, and that was the way the, the

22 gospel was going to be broadcast.

23          A     Yes, sir.

24          Q     Over these low-power translator stations.

25                 JUDGE CHACHKIN: Is that right?

1 MR. ESPINOZA: Yes, sir.

2 BY MR. COHEN:

3 Q And what I, what I think it's important that you,  
4 you tell us is you, of course, realize that it takes money to  
5 do anything. And these stations were being applied for. And  
6 did you have an understanding as to where the money was going  
7 to come from to construct these stations to spread the Lord's  
8 gospel?

9 A I had the understanding that the monies would come  
10 from Trinity, sir.

11 Q And that understanding came from whom?

12 A To the best of my recollection, sir, it would have  
13 been with a conversation with Mrs. Duff.

14 Q And if you can recall, it would be useful to give,  
15 to give us your best recollection of what Mrs. Duff told you  
16 about this matter, that is concerning the funding of the --

17 A Mr. Cohen, it's been so long, I don't think I can  
18 give you the content. But I, I remember that we dealt with  
19 the issues, sir.

20 Q Well, maybe I can be helpful. I, I recognize  
21 you're, you're testifying about events that occurred 13, 14  
22 years ago. And I, I recognize that's not easy to do. But let  
23 me try to help you.

24 Did, did you ever -- did Mrs. Duff ever talk to you  
25 about whether the money from Trinity was going to be a gift or

1 a loan for example?

2 A No. It's, it's my understanding that it was a loan,  
3 sir.

4 Q And was it going to be a loan for a period of time?

5 A That I couldn't answer honestly.

6 Q Was there going to be any interest charged on the  
7 loan?

8 A That I don't remember either, sir.

9 Q Do you ever recall any, any documents that were ever  
10 prepared reflecting the loan, the loans from Trinity to TTI?

11 A Yes.

12 Q Can you give me your best recollection of that?

13 A No, not other than Mrs. Duff and I talked about  
14 obtaining a loan, that it would be paid back. But I honestly  
15 can't remember that detail about if there would be any  
16 interest or not. I really don't remember.

17 Q Was there any limit ever given to you by Mrs. Duff  
18 as to how much money Trinity was prepared to loan TTI ever?  
19 And I mean from the day you became a director until the day  
20 you resigned.

21 A I believe there was, Mr. Cohen.

22 Q Can you share that with us?

23 A No, I'd be, I'd be guessing, sir. I couldn't tell  
24 you truthfully.

25 JUDGE CHACHKIN: I believe you testified that there

1 | were documents concerning these loans? Have you ever seen any  
2 | such documents?

3 |           MR. ESPINOZA: I seem to recall seeing one, sir.

4 |           JUDGE CHACHKIN: What? What, what was the nature of  
5 | the document you recall seeing?

6 |           MR. ESPINOZA: I believe that it was in reference to  
7 | the operating budget for TTI/NMTV. But I really can't recall,  
8 | sir.

9 |           JUDGE CHACHKIN: So you --

10 |           MR. ESPINOZA: If I said otherwise, I'd honestly be  
11 | guessing, sir.

12 |           JUDGE CHACHKIN: So you're guessing whether or not  
13 | you saw documents, is that what you're saying?

14 |           MR. ESPINOZA: I, I recall that, that I saw one.

15 |           JUDGE CHACHKIN: But you don't know what the  
16 | contents of the document were.

17 |           MR. ESPINOZA: I know that it dealt with a loan from  
18 | Trinity, sir.

19 |           MR. COHEN: Let me try to help you. I think I may  
20 | know what you're talking about. Let me see if I can be of  
21 | assistance.

22 |           (Pause.)

23 |           MR. COHEN: Your Honor, can we go off the record for  
24 | a moment?

25 |           JUDGE CHACHKIN: Yes.



1 (Off the record.)

2 JUDGE CHACHKIN: Back on the record. What  
3 exhibit --

4 MR. COHEN: Look at, look at -- he said modestly.  
5 Look at Bureau Exhibit 20 if you would. That's --

6 JUDGE CHACHKIN: That's the first volume.

7 MR. COHEN: That's the first volume.

8 JUDGE CHACHKIN: Over there, pastor.

9 MR. COHEN: You have to be quick to keep track of  
10 all these volumes.

11 JUDGE CHACHKIN: You have to --

12 MR. ESPINOZA: Twenty?

13 BY MR. COHEN:

14 Q Yes. Because I recall that during your deposition I  
15 think Mr. Shook asked you about that. And maybe that's what  
16 you're talking about. Is that what you had in mind, pastor?

17 (Pause.)

18 A It's very possible, sir.

19 Q Well, that's the only document that I can think of.  
20 And I was wondering if that was what you meant.

21 A Perhaps that's, that's it, sir. I just know that I  
22 had seen -- I seem to recall seeing a document concerning the  
23 loan.

24 JUDGE CHACHKIN: All right. We'll, we'll be in  
25 recess until 9 a.m. tomorrow morning. Thank you.